

October 4, 2019

President Donald J. Trump
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Re: Rescinding the Executive Order on Evaluating and Improving the Utility of Federal Advisory Committees

Dear Mr. President:

The undersigned organizations are writing to ask that you rescind the Executive Order on Evaluating and Improving the Utility of Federal Advisory Committees.¹ By requiring elimination of one-third of existing advisory committees and capping the total number of committees at 350, the order would arbitrarily eliminate essential advice that informs government decisionmaking. Its rationale is specious, and its impacts would be severe.

It is reasonable for each agency to assess its own advisory needs on regular basis, which is why this is already done by agencies as required by the Federal Advisory Committee Act and tracked by the General Services Administration.² The order does not explain why this existing process is insufficient, nor justify its apparent assumption that one-third of existing committees are no longer necessary and that the government does not need more than 350 advisory committees.

The justification for this order is to reduce costs to the government, but advisory committees provide substantial value to agencies for costs far below those of hiring additional staff or contractors to perform the duties they fulfill. Agency staff run a few meetings per year and compensate committee members for economy-class travel and other small expenses incurred. Gathering premier experts who volunteer their time to deliberate on pressing matters is a bargain for taxpayers. Further, there is no evidence to support that cutting advisory committees will result in fewer agency costs. To the contrary, a GAO report examined the costs before and after President Clinton's 1993 executive order that cut committees and found that while the number of advisory committees declined during the four years after the order, the costs increased by four percent.³ A case can and should be made for committees to be sunset once their charges are complete, but the costs of running active committees are small compared to the valuable advice they provide to the agencies they serve.

Reaching a goal of 350 total committees across the government is an arbitrary number that will not help our agencies ensure that policies are based in science and respond to public need and its research programs are doing the highest quality work possible. For agencies like the U.S. Department of Health and Human Services, cutting one-third of discretionary advisory committees means that it will have to choose between a range of active public health needs, from infant mortality to sickle cell disease. Similarly, the Environmental Protection Agency will have to make difficult decisions, such as between a committee studying how best to protect children's health or one that focuses on environmental justice issues.

¹ <https://www.whitehouse.gov/presidential-actions/executive-order-evaluating-improving-utility-federal-advisory-committees/>

² <https://www.govinfo.gov/content/pkg/USCODE-2012-title5/pdf/USCODE-2012-title5-app-federalad.pdf>

³ <https://www.gao.gov/assets/110/107157.pdf>

The value of our government's federal advisory committee infrastructure cannot be overstated. Scientific and technical advisory committees provide independent reviews of the evidence and debate issues ranging from the best way to minimize exposure to lead from drinking water to understanding how best to collect information as a part of the U.S. census.⁴ Other committees offer advice on policies and provide an avenue for agencies to receive feedback from key stakeholder groups, such as women serving in the armed forces⁵ or agriculture and rural communities.⁶ The process by which advisory committees operate provides avenues for all stakeholders to give input on agency actions, as all advisory committees hold open meetings with public comment opportunities. The federal advisory committee process is an important and unmatched venue for transparent deliberations on federal matters that gives members of the public the opportunity to observe and hold agencies accountable.

The removal of advisory committees across the government without a compelling rationale is a threat to a vital independent source of information and deliberation. It will undoubtedly result in a net loss of independent expert capacity and institutional knowledge and leave important work unfinished or underdeveloped. Further, it will result in fewer opportunities for the public to participate in agency decision making and weigh in on issues that impact them directly. We urge you to rescind this executive order in order to preserve this vital advisory committee network and uphold public trust in the integrity and rigor of government decisions.

Sincerely,

Acadia Institute of Oceanography
American Federation of State, County and Municipal Employees (AFSCME)
American Federation of Teachers
American Littoral Society
American Public Health Association
American Statistical Association
Asian Pacific American Labor Alliance
Campaign for Accountability
Campaign for Youth Justice
Center for Auto Safety
Center for Biological Diversity
Center for Global Development
Center for Progressive Reform
Center for Science in the Public Interest
Citizens for Responsibility and Ethics in Washington (CREW)
Climate Science Legal Defense Fund
Coalition for Disability Health Equity
Conservation Law Foundation
Consortium for Ocean Leadership
CUNY School of Public Health, affiliation only
Defenders of Wildlife
Electronic Privacy Information Center
Environmental Defense Fund
Environmental Protection Network

⁴ <https://www.census.gov/about/cac/sac.html>

⁵ <https://dacowits.defense.gov/About/Charter/>

⁶ <https://www.epa.gov/faca/frrcc>

Federal Managers Association
Food & Water Watch
Friends of the Earth
Georgetown University
Government Accountability Project
Government Information Watch
Greenpeace USA
Inland Ocean Coalition
International Brotherhood of Electrical Workers
International Chemical Workers Union Council (ICWUC)
International Marine Mammal Project of Earth Island Institute
Jacobs Institute of Women's Health
Johns Hopkins Center for a Livable Future
Milwaukee Riverkeeper
Montana Organic Association
National Federation of Federal Employees
National LGBTQ Task Force
National Nurses United
National Security Counselors
National Sustainable Agriculture Coalition
Natural Resources Defense Council
New England Aquarium
New England Farmers Union
NY4WHALES
Ocean Conservancy
Ocean Conservation Research
Oceana
Oceanic Preservation Society
Open the Government
Oregon Tilth
Pacific Environment
PhilaPOSH
Project On Government Oversight
Protect Papahanaumokuakea Coalition
Public Citizen
Public Employees for Environmental Responsibility
Revolving Door Project
Rural Coalition
SafeWork Washington
Saunders Hotels
Save Our Shores
Senior Executives Association
Service Employees International Union (SEIU)
Seven Circles Foundation
Union of Concerned Scientists
University of Illinois at Chicago School of Public Health
University of Minnesota

University of North Carolina, Chapel Hill
Virginia Association for Biological Farming
Whale and Dolphin Conservation

Cc: Mick Mulvaney, Office of Management and Budget Director